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January 11, 2012

Hon. Ramon E. Reyes, Jr., U.S.M.J.  
UNITED STATES DISTRICT COURT  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE:     *Sebrow, et al. v. Fulton, Friedman & Gullace, LLP***  
E.D.N.Y. Case No. 1:10-cv-05897-DLI-RER

Dear Judge Reyes,

I am co-counsel for the Plaintiff. I am writing in regard to the pending motion for admission pro hac vice motion of Robert E. Schroth Jr., Esq. [Doc. 55]. In reviewing the filed motion, I noticed that Plaintiff neglected to include a copy of Mr. Schroth's certificate of good standing for the State of Wyoming, which should have been attached as Exhibit B to my declaration [Doc. 55-1]. Accordingly, I am attaching a copy of Mr. Schroth's Wyoming certificate of good standing and respectfully request the Court consider it in conjunction with the pending motion for admission.

At present, Plaintiff has scheduled the deposition of Defendant, Cynthia L. Fulton, which is to take place in Phoenix, Arizona on January 18, 2012. Mr. Schroth has made plans to take Ms. Fulton's deposition. Defendant's counsel, Deborah Zawadzki, recently advised that Defendant will object to the deposition being taken by Mr. Schroth in the event he is not admitted pro hac vice prior to the start of Ms. Fulton's deposition. Accordingly, and to the extent possible, Plaintiff further requests that the Court issue an expedited ruling on Mr. Schroth's pending motion for admission [Doc. 55].

Plaintiff thanks Your Honor in advance for the Court's consideration of the herein requests.

Very truly yours,  
s/William F. Horn

William F. Horn

*Encl:stated*  
*via ECF Filing Only*

cc:     All Counsel of Record *via ECF Filing*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE  
STATE OF WYOMING**

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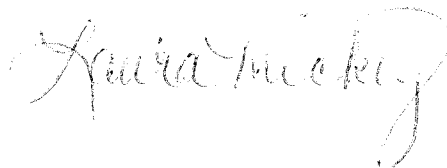
I, Judy Pacheco, Clerk of the Supreme Court of the State of Wyoming, hereby certify that, according to the records of my office:

**Robert Elmer Schroth Jr.**

was on the 14th day of January, 2002, duly admitted to practice as an Attorney and Counsellor at Law in all the courts of Wyoming; that the above admittee has never been disbarred or suspended; that no disciplinary proceedings are pending against this admittee; and that this admittee's name now appears on the Roll of Attorneys in this office as a member of the bar in good standing.

Given under my hand and the seal of said  
Court this 9th day of January, 2012.

Judy Pacheco, Clerk



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by deputy